

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**JOEY TAYLOR,
Plaintiff,**

VS.

**APPLE INC.,
Defendant.**

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CIVIL ACTION NO. 3:17-CV-03093-M

MOTION TO WITHDRAW AS COUNSEL OF RECORD

NOW COMES Christian Jenkins, counsel of record for Plaintiff, and files this Motion to Withdraw as Counsel of Record, and in support of this Motion would respectfully show unto this Court the following:

I.

(A) Undersigned counsel has formulated theories of the case so fundamentally different from his client's position on the fact issues and matters of law, and how the case should be handled, that this attorney would not adequately be able to fully represent his client in an adversary proceeding in this case.

(B) On March 14, 2018, Plaintiff stated in an email to my legal assistant, "I will not speak with any of you on the phone because the very small amount of trust that I had in y'all is now completely gone."

II.

(A) Pursuant to Local Rule 83.12, the following information is provided:

- (1) Plaintiff Joey Taylor's address is 3600 Brown Trail, Bedford, Texas 76021.
Plaintiff's telephone number is 214-632-7477, Plaintiff's e-mail address is jdtii214@icloud.com.
- (2) Upon information and belief, substitute counsel has not been retained by Plaintiff at this juncture.

III.

(A) Undersigned counsel has informed Plaintiff of any upcoming deadlines in this matter, which are as follows:

- (1) Plaintiff has been given a copy of the scheduling order.
- (2) Plaintiff is required to designate expert witnesses by June 4, 2018, as required by Rule 26a.
- (3) The parties are required to file a Joint Settlement and Status report by July 30, 2018.
- (4) Plaintiff is required to complete discovery by October 12, 2018.

WHEREFORE, PREMISES CONSIDERED, undersigned counsel Christian Jenkins, respectfully requests that this Court allow undersigned counsel to withdraw as attorney of record in this case.

Respectfully submitted,
Law Offices of Christian Jenkins, P.C.

/s/Christian Jenkins
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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that a conference regarding the relief requested in the foregoing pleading was held with counsel for the Defendant, and said counsel is not able to confirm whether they are opposed or unopposed. Plaintiff is opposed to this motion.

/s/Christian Jenkins

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been furnished to opposing counsel of record by a manner compliant with the Federal Rules of Civil Procedure on the 20th day of **March, 2018**.

I further certify that a true and correct copy of the foregoing document has been provided to client Joey Taylor, via certified mail, return receipt requested, and postage-paid, and email, to his address of record on the 20th day of **March, 2018**.

/s/Christian Jenkins